

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMAX, INC. and WORKTOOLS, INC.,

Plaintiffs,

v.

ACCO BRANDS CORP.

Defendant.

Case No.: 1:16-cv-10695-NMG

**JOINT MOTION FOR A PROTECTIVE ORDER**

Plaintiffs Amax, Inc. and WorkTools, Inc. ("Plaintiffs") and ACCO Brands Corp. ("Defendant"), by and through their undersigned counsel, hereby move to enter the Stipulated Protective Order, attached as Exhibit A.

AMAX, INC. AND WORKTOOLS, INC.

By Their Attorneys,

/s/ Christine K. Bush

Christine K. Bush (BBO No. 635381)  
cbush@hinckleyallen.com  
HINCKLEY, ALLEN & SNYDER LLP  
100 Westminster Street, Suite 1500  
Providence, Rhode Island 02903  
(401) 274-2000 Phone  
(401) 277-9600 Fax

Jason C. Williams (BBO No. 691051)  
jwilliams@hinckleyallen.com  
HINCKLEY, ALLEN & SNYDER LLP  
28 State Street  
Boston, Massachusetts 02109  
(617) 345-9000 Phone  
(617) 345-9020 Fax

ACCO BRANDS CORP.

By Its Attorneys,

/s/ Chad S.C. Stover

Chad S.C. Stover (*admitted pro hac vice*)  
Chad.Stover@btlaw.com  
Barnes & Thornburg LLP  
1000 N. West Street, Suite 1500  
Wilmington, DE 19801  
(302) 300-3474 Phone

Heather B. Repicky (BBO #663347)  
hrepicky@nutter.com  
Nutter McClennen & Fish LLP  
Seaport West  
155 Seaport Boulevard  
Boston, MA 02210  
(617) 439-2000 Phone

*Subject to the caveat stated on p. 14 of the protective order,  
motion allowed. gmg/rgt, US DJ 9/13/17*